

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 18-257
	)	UNDER SEAL
ARMOND L. LONG	)	(18 U.S.C. §§ 2, 844(h)(1), 1341 and 1343)
LASHAUMBA O. RANDOLPH	)	

SUPERSEDING INDICTMENT

**FILED**

COUNTS ONE THROUGH THREE

**FEB 04 2020**

The grand jury charges:

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

1. From on or about September 1, 2017, and continuing thereafter until in or around May of 2018, in the Western District of Pennsylvania and elsewhere, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, and other persons known to the grand jury, devised and intended to devise a scheme to defraud the State Farm Fire and Casualty Company (hereinafter "State Farm") and the Progressive Direct Insurance Company (hereinafter "Progressive") by means of false and fraudulent pretenses and representations, as set forth in more detail below.

THE SCHEME TO DEFRAUD

2. It was part of the scheme to defraud that defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, for the purpose of acquiring insurance policies from State Farm and Progressive, made and caused to be made false and fraudulent representations to State Farm and Progressive regarding the ownership interests in the following vehicles:

- (a) 2010 Acura MDX, having VIN 2HNYD2H67AH526841 (hereinafter "the MDX").
- (b) 2016 Cadillac Escalade, having VIN 1GYS4HKJ9GR357310 (hereinafter "the Escalade"); and
- (c) 2011 Nissan Maxima, having VIN 1N4AA5AP0BC817308 (hereinafter "the Maxima").

3. It was further a part of the scheme to defraud that, as a result of the above-referenced false representations made and caused to be made by defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH:

- (a) State Farm issued an insurance policy in the names of Randolph Holdings and Lashaumba Randolph covering the MDX;
- (b) Progressive issued an insurance policy in the name of a person known to the grand jury covering the Escalade; and
- (c) Progressive issued an insurance policy in the name of B.C. covering the Maxima.

4. It was further a part of the scheme to defraud that, in or around December of 2017, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, and other persons known to the grand jury, represented and caused to be represented to State Farm that the MDX had been involved in a multi-vehicle accident with the Escalade and the Maxima, when in truth and fact, and as defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH well knew, such representations were false and fraudulent when made.

5. It was further a part of the scheme to defraud that, in or around December of 2017, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, and other persons known to the grand jury, represented and caused to be represented to Progressive that the Escalade had been involved in a multi-vehicle accident with the MDX and the Maxima, when in truth and fact, and as defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH well knew, such representations were false and fraudulent when made.

6. It was further a part of the scheme to defraud that, in or around December of 2017, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, and other persons known to the grand jury, represented and caused to be represented to Progressive that the Maxima had

been involved in a multi-vehicle accident with the Escalade and the MDX, when in truth and fact, and as defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH well knew, such representations were false and fraudulent when made.

7. It was further a part of the scheme to defraud that, in or around December of 2017, as a result of the false and fraudulent representations made by defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, and other persons known to the grand jury, Progressive issued a payment to defendant ARMOND L. LONG (doing business as AAA Auto Sales) for damage to the Escalade, and State Farm issued a payment to defendant LASHAUMBA O. RANDOLPH for damage to the MDX.

8. It was further a part of the scheme to defraud that, in or around January of 2018, defendants LASHAUMBA O. RANDOLPH and ARMOND L. LONG caused the MDX and the Escalade to be damaged and destroyed by fire.

9. It was further a part of the scheme to defraud that, in or around January of 2018, defendant LASHAUMBA O. RANDOLPH caused a claim to be made to State Farm for the fire damage to the MDX, at which time defendant LASHAUMBA O. RANDOLPH falsely and fraudulently represented to State Farm that he had nothing to do with the fire.

10. It was further a part of the scheme to defraud that, in or around January and February of 2018, defendant ARMOND L. LONG represented and caused to be represented to Progressive that AAA Auto Sales was providing financing to Dionne L. Amison for the Escalade, when in truth and fact, and as defendant ARMOND L. LONG well knew, such representation was false and fraudulent when made.

11. It was further part of the scheme to defraud that, in or around January and February of 2018, defendant ARMOND L. LONG and other persons known to the grand jury submitted a

claim to Progressive relating to the fire which damaged and destroyed the Escalade, in an effort to persuade Progressive to issue a check payable to AAA Auto Sales for the loss.

12. It was further part of the scheme to defraud that, in or around January and February of 2018, defendant ARMOND L. LONG concealed from Progressive, and caused to be concealed from Progressive, the fact that defendant ARMOND L. LONG had caused the Escalade to be damaged and destroyed by fire.

COUNT ONE  
USE OF INTERSTATE WIRES

On or about January 16, 2018, in the Western District of Pennsylvania and elsewhere, for the purpose of executing the scheme to defraud, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, transmitted and caused to be transmitted, in furtherance of the scheme to defraud, communications in interstate commerce, that is, an interstate telephone call between a person at Darrin's Auto in the Western District of Pennsylvania and a representative of State Farm in Malta, New York.

In violation of Title 18, United States Code, Sections 2 and 1343.

COUNT TWO  
USE OF THE UNITED STATES MAIL

The grand jury further charges:

On or about February 27, 2018 in the Western District of Pennsylvania, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, for the purpose of executing the scheme to defraud, knowingly caused to be delivered by United States mail, according to the directions thereon, a letter which had been sent by Progressive to an address on McClure Street in Homestead, Pennsylvania.

In violation of Title 18, United States Code, Sections 2 and 1341.

COUNT THREE  
USE OF UNITED STATES MAIL

The grand jury further charges:

On or about March 15, 2018 in the Western District of Pennsylvania, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH, for the purpose of executing the scheme to defraud, knowingly caused to be delivered by United States mail, according to the directions thereon, a letter which had been sent by Progressive to an address on Third Street in Clairton, Pennsylvania.

In violation of Title 18, United States Code, Sections 2 and 1341.

COUNT FOUR

The grand jury further charges:

THE SCHEME TO DEFRAUD STATE FARM REGARDING THE CAMARO

1. From on or about September 1, 2017, and continuing thereafter until in or around May of 2018, defendant LASHAUMBA O. RANDOLPH devised and intended to devise a scheme to defraud the State Farm Fire and Casualty Company (hereinafter “State Farm”) by means of false and fraudulent pretenses and representations, as set forth in more detail below.

2. In or around September of 2017 and February of 2018, defendant LASHAUMBA O. RANDOLPH represented to State Farm that he, and his business known as the Street Institute Technology Transportation Engineering LLC, were the lawful owners of a 2017 Chevrolet Camaro, having VIN 1G1FF1R75H0174522, which had been stolen in or around March of 2017 (hereinafter “the Camaro”), when in truth and fact, and as defendant LASHAUMBA O. RANDOLPH well knew, such representation was false and fraudulent when made in that the Camaro had been stolen.

3. In or around September, 2017, defendant LASHAUMBA O. RANDOLPH purchased an insurance policy from State Farm, in the name of the Street Institute Technology Transportation Engineering, LLC, covering the Camaro.

4. On or about December 27, 2017, defendant LASHAUMBA O. RANDOLPH caused the Camaro to be towed to Johnny’s Auto in Clairton, PA.

5. On or about January 5, 2018, defendant LASHAUMBA O. RANDOLPH caused the Camaro to be burned on the lot of Johnny’s Auto.

6. On or about February 5, 2018, defendant LASHAUMBA O. RANDOLPH caused a claim to be submitted to State Farm in an effort to recover insurance proceeds relating to the Camaro fire.

7. On or about February 27, 2018, defendant LASHAUMBA O. RANDOLPH represented to State Farm that he had not been involved in causing the Camaro fire, when in truth and fact, and as defendant LASHAUMBA O. RANDOLPH well knew, such representation was false and fraudulent when made.

8. On or about February 28, 2018, defendant LASHAUMBA O. RANDOLPH submitted an Affidavit of Vehicle Fire wherein defendant LASHAUMBA O. RANDOLPH represented to State Farm that he was making a claim for the value of the Camaro, and that the statements contained within the Affidavit of Vehicle Fire were true and correct, when in truth and fact, and as defendant LASHAUMBA O. RANDOLPH well knew, several representations contained therein were false and fraudulent when made.

THE USE OF INTERSTATE WIRES IN FURTHERANCE OF THE SCHEME  
TO DEFRAUD STATE FARM REGARDING THE CAMARO

9. On or about February 5, 2018, in the Western District of Pennsylvania and elsewhere, for the purpose of executing the scheme to defraud State Farm regarding the Camaro, defendant LASHAUMBA O. RANDOLPH caused to be transmitted, by means of communication in interstate commerce, a telephone call between a person at Johnny's Auto in the Western District of Pennsylvania and a representative of State Farm located in Tulsa, Oklahoma.

In violation of Title 18, United States Code, Sections 2 and 1343.

COUNT FIVE

The grand jury further charges:

1. The allegations set forth in paragraphs 1 through 12 in support of Counts One through Three above are hereby incorporated as if fully set forth herein..

2. On or about January 14, 2018, in the Western District of Pennsylvania and elsewhere, defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH used fire to commit a felony which may be prosecuted in a Court of the United States, to-wit: defendants ARMOND L. LONG and LASHAUMBA O. RANDOLPH used fire and caused fire to be used to destroy the Escalade and the MDX to commit the offense known as Wire Fraud, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 2 and 844(h)(1).



COUNT SIX

The grand jury further charges:

1. The allegations set forth in paragraphs 1 through 9 in support of Count Four above are hereby incorporated as if fully set forth herein.

2. On or about January 5, 2018, in the Western District of Pennsylvania, defendant LASHAUMBA O. RANDOLPH used fire to commit a felony which may be prosecuted in a Court of the United States, to wit: defendant LASHAUMBA O. RANDOLPH used fire and caused fire to be used to destroy the Camaro to commit the offense known as Wire Fraud, as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 2 and 844(h)(1).

A True Bill,



Foreperson



SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352